	LILLIAN TING TO ALICHTE	OV
1	WILLIAM JOHN DAUGHTE CDCR#F-7998S	2008 JUL -3 AM 10: 21
2	P.O. Box 2349/D10-1/041	CLERK US DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA
3	CHWCKAWALLA VALLEY STATE T	
5	BLYTHE CALIFORNIA 9222	· .
6		nunc pro tunc
7	UNITED STATES	DISTRICT COURTUN 2 7 2008
8	SOUTHERN DISTRICT of	CALIFORNIA
9		
10	WILLIAM JOHN DAUGHTERYS	)CIVIL CASENO. 08 CVO 408 WOR (BLM)
11	PLAINTIFF, V.	MOTION AND REQUEST FOR ISSUANCE
12	DENNIS WILSON, S.D.P.D.	OF CIVIL SUBPDENA (DUCES
13	ES MERALDA TAGABAN, SAPA,	TECUM) FOR PRODUCTION OF
14	1	DOCUMENTS AS DISCOVERY AND
15		EXHIBITS FOR JURY TRIAL
	ON THE DIVINE NEOF	WITH DECLARATIONS AND PROOF OF SERVICE. FRCP. RULE 45
17	SANDIEGO POLICE DETI.  DEFENDANTA	of service. Prolinate 7
18		DATE: 195UNE 2008
19		
20 21	T. WILLAM SOHN DANGE	HERY, PETITIONER AND PLAINTIFF
22	IN THE ABOVE ACTION, P	ROCEEDING PROSE AND IN
23	FORMA PAUPERIS, DO HER	BY REQUEST AND MOVE THAT
24	THE COURT ORDER THE	PRODUCTION OF THE BELOW ZISTED
25	DOCUMENTS, RECORDS AND MATERIALS, INCLUDING ALL	
26	PRESERVED BY MEANS	MECHANICAL, ELECTRONIC OR
2		SAID DOCUMENTS BE DELIVERED
28	INTO THE CUSTODY OF	THE PLAINTIFF, PURSUANT
		CONTINUED

Ca	Se 3:08-cv-00408-WQH-BLM Document 30, 1/2 Filed 07/03/2008 Page 2 of 4
	CIVIL CASENO.
1	MOTION AND REQUEST FOR ISSUANCE OF SUBPOSUA
2	PRODUCTION of DOCUMENTS AS DISCOVERY
3	
4	TO FEBERAL RULES OF CIVIL PROCEDURE, RULE (8) 45
5	26,37. AND 34. THE PARTY NAMED BELOW HAS
6	CONTROL AND POSSESSION OR WILL ACQUIRE POSSESSION
7	of THE FOLLOWING LISTED DOCUMENTS OR MATERIALS
8	WHEREAS THEY ARE MATERIAL TO THE PROOF OF
9	THE ISSUES INVOCUED IN THIS CASE. GOOD CAUSE
10	ZYISTS FOR THE PRODUCTION OF MATERIALS AND NOTE
71	of ROLEVANCE AND PROBATIVE VALUE FOLLOWS DESCRIPTION
12	of EACH RODUESTON I TOM. THE COURT IS REQUESTED
13	TO IMPLEMENT THE PRESCRIBED PENALTIES FOR
1/	FAILURE TO COMPLY WITH ITS ORDER. (FIRST 37)
15	AND IT IS FURTHER REQUESTED THAT PRODUCTION AWIS
16	DELIVERY BE PERFORMED WITHIN A REASONABLE PERIOD,
17	AND AS PETITIONER IS IN TORMA PAUPERIS, THAT
18	ALL FEES INCURRED IN 1554ING MAIS SERVICE OF SURPOSMA
19	BE BORNE AND ADVANCED BY THE UNITED STATES
20	PENDING SUCCESSFUL SCTTLEMENT OR VERDICT.
21	IN THE UPSE OF MEDICAL RECORDS OF REQUESTOR; ALL
22	LEGAL CLAIMS RECARDING PRIVACY ISSUES ARE ITERE
23	By felinquisted AND POSSESSOR IS NOT HELD LIABLE
24	for OBODIENCE TO COURTS COMMAND TO PRODUCE. WRITTIN
25	OBSELVATIONS AND CONCLUSIONS MAY BE SUBSTITUTED
2.6	N LIEU of RADIOGRAPHIC (INCLUSING SONOGRAM + X-RAY)
2'	IF REPRODUCTION of Such imposes UNDUE BURDEN'
	AND EXPENSE.
	11

•	Çв	\$6 3:08 GW-09488 WPH BLM Document 30-3 Filed 07/03/2008 Page 3 of 4 Coc RHF7 9985
		RO. Box 2349/D10-110ur
	1	BLYTHE, CA. 92226 RE: 08CUOY08 WQH(BLM) PAGE 3
	2	REQUEST FOR CIVIL SUBPOENAL DUCKS TECUM)
	3	FEBERAL RULES OF CIVIL PROCEDURE RULE 45@XIXC) (1)
	4	ADVISEMENT TO SUBPOENAED
	5	
	6	F.R.C.P. 45ax()(c)
	7	ComBINING OR SEPARATING COMMIND TO PRODUCE OR PERMIT
	8	INSPECTION, SPECIFYING THE FORM FOR ELECTRONICALLY STORED
	9	INFORMATION; A COMMAND TO PRODUCE DOCUMENTS, ELECTRONICALLY
	10	STORED INFORMATION OR TANGIBLE THINGS OR TO PERMIT THE
	11	INSPECTION OF PREMISES MAY BE INCLUDED IN A SUBPOENA
:	12	COMMANDING ATTENDANCE AT A DISPOSITION HEARING, OR TRIAL
		OR MAY BE SET OUT IN A SEPARATE SUBPOENA A SUBPOENA MAY
	14	Specify 1HE FORM OR TORMS IN WHICH ELECTRONICALLY STORED
	15	INFORMATION & IS TO BE PRODUCED.
	16	
	17	FRGP, 45(aX1)(D)
	<b>1</b> 8	Command to PRODUCE & INCLUDED OBLIGATIONS: A COMMAND
	<b>1</b> 9	to PRODUCE DOCUMENT, ELECTRONICALLY STORED INFORMATION
	20	OR TANGIBLE THINGS REQUIRES THE RESPONDING PARTY
	21	10 PERMIT INSPECTION, COPYING, TESTING OR SAMPLINE
	22	of the MATCRIACS.
	23	
	24	
·	<b>2</b> 5	The Cart Margare Man House to Sea a com mattered S.
	26	INCLUDING THOSE METHANICALLY AND/OR ELECTRONICALLY
	27	STORED:
	28	

11	WILLIAM DAUGHTERY DATE: 19 JUNG 2008. F-79985 COCR#
	L- 199X9 COCK #
1	P.O. BOX 2349 BLYTHE, CA. 92226 RE: OBCUOYOS WOH (BLM) PAGE 4
2	REQUEST FOR CIVIL SUBPOENA (DUCES TECLIM)
3	I Toms to Be PRODUCED:
4	I. MEDICAL RE:7735747 + 6704525
5	ALL MEDICAL RECORDS FOR THE ABOVE NAMED
6	INDIVIDUAL FOR THE PERIOD (DATE) 9 MARCH 2002
7	MNTIL (DATE) JULY 30, 2008, INCL. INMKE 3 CREENING
8	
9	I. ASYCHOLOGICAL RE: 7735747 AND 6704525
10	ALL PSYCHOCOGICAL RECORDS FOR THE ABOVE NAMED
11	INDIVIDUAL for THE PERIOD (DATE) 9 MARCH 2006
12	UNTIL (DATE) SULY 30,2007 . INCL. INTAKES CREENING
13	
[	
14	
14 15	THIS REQUEST ACTS AS RELEASE OF MEDICAL INFORMATION
	THIS REQUEST ACTS AS RELEASE OF MEDICAL INFORMATION CONSENT BY THE PATIENT / PLAINTIFF IN THIS ACTION!
15	CONSENT BY THE PATIENT / PLAINTIFF IN THIS ACTION!  THE REGULATED ITEMS ARE MAINTAINED AT:
15 16 17	CONSENT BY THE PATIENT / PLAINTIFF IN THIS ACTION!  THE REGULATED ITEMS ARE MAINTAINED AT:
15 16	CONSENT BY THE PATIENT / PLAINTIFF IN THIS ACTION!
15 16 17 18	CONSENT BY THE PATIENT PLAINTIFF IN THIS ACTION!  THE REQUESTED ITEMS ARE MAINTAINED AT:  GEORGEF. BAILEY DETENTION FACILITY (\$KG# 7/35747 AND 6704525)
15 16 17 18 19 20	CONSENT BY THE PATIENT PLAINTIFF IN THIS ACTION!  THE REQUESTED ITEMS ARE MAINTAINED AT:  GEORGEF. BAILEY DETENTION FACILITY (\$KG\$ 7735747 AND 6704525)  446 ALTA ROAD, SUITE 5 300
15 16 17 18	CONSENT BY THE PATIENT PLAINTIFF IN THIS ACTION!  THE REQUESTED ITEMS ARE MAINTAINED AT:  GEORGE F. BAILEY DETENTION FACILITY (&KG# 7/35747 AMS 6704525)  YHO ALTA ROAD, SUITE 5 300  SAN DIEGO, CALIFORNIA 92158
15 16 17 18 19 20 21	CONSENT BY THE PATIENT / PLAINTIFT IN THIS ACTION!  Alte REQUESTED ITEMS ARE MAINTAINED AT:  GEORGEF. BAILEY DETENTION FACILITY (8KG# 7735747 AND 6704525)  YHO ALTA ROAD, SUITE 5300  SAN DIEGO, CALIFORNIA 92158  PHONE # (619) 661-2620  A Copy of This Document His Been MAILED TO ATTORNAY'S FOR
15 16 17 18 19 20 21 22	CONSENT BY THE PATIENT / PLAINTIFT IN THIS ACTION!  Alte REQUESTED ITEMS ARE MAINTAINED AT:  GEORGE F. BAILEY DETENTION FACILITY (&KG# 7735747 AM)6704525)  446 ALTA 20AD, SUITE 5 300  SAN DIEGO, CALIFORNIA 92158  PHONE # (619) 661-2620  A Copy of This DOCUMENT HAS BEEN MAILED TO ATTORNAY'S FOR  DEFENDANTS AND I CORTIFY AND SWEAR THE FOREGOING IS TRUE.
15 16 17 18 19 20 21 22 23	CONSENT BY THE PATIENT / PLAINTIFT IN THIS ACTION!  Alte REQUESTED ITEMS ARE MAINTAINED AT:  GEORGEF. BAILEY DETENTION FACILITY (\$K6#7735747 AND 6704525)  YHO ALTA ROAD, SUITE 5300  SAN DIEGO, CALIFORNIA 92158  PHONO # (619) 661-2620  A Copy of This Document HAS BEEN MAILED TO ATTORNAY'S FOR  DEFENDANTS AND I CORTIFY AND SWEAR THE FOREGOING IS TIRUE.  MICHAEL S. AGURRE, OTHER AND SUCHE THE SIGNARY.
15 16 17 18 19 20 21 22 23 24	CONSENT BY THE PATIENT PLAINTIFF IN THIS ACTION!  Afte REQUESTED ITEMS ARE MAINTAINED AT:  GEORGEF, BAILEY DETENTION FACILITY (&KG# 7/35747 AND 6704525)  YHE ALTA ROAD, SUITE 5300  SAN DIEGO, CALIFORNIA 92158  PHONE # (619) 661-2620  A Copy of This Document His Been MAILER TO ATTORNAY'S FOR  DEFENDANTS AND I CONTINY AND SWEAR THE FORESOING IS TRUE.  MICHAEL S. AGURRE, CRYMTORNES  C/O WENDY DAVISSON, DE PUTYCITYATY.
15 16 17 18 19 20 21 22 23 24 25	CONSENT BY THE PATIENT PLAINTIFT IN THIS ACTION!  AHE REQUESTED ITEMS ARE MAINTAINED AT:  GEORGEF. BAILEY DETENTION FACILITY (8KG# 7/35747 AMS6704525)  YHO ALTA ROAD, SUITE 5300  SAN DIEGO, CALIFORNIA 92158  PHONO # (619) 661-2620  A COPY of THIS DOCUMENT HAS BEEN MAILED TO ATTORNIY'S FOR  DEFENDANTS AND I COPYTY AND SWEAR THE FORESOING IS TRUE.  MICHAEL S. AGURE, CRY MIDENES  C/O WENDY DAVISSON, DE PUTYCHYAMY.
15 16 17 18 19 20 21 22 23 24 25 26	CONSENT BY THE PATIENT PLANTIFF IN THIS ACTION!  ATTERNATION THE MAINTAINED AT!  GEORGEF, BAILEY DETENTION TACKING (8KG#7735747 AND 6704525)  YHO ALTA ROAD, SUITE 5300  SAN DIEGO, CALIFORNIA 92158  PHONO # (Colq) 661-2620  A Copy of This Document His seen MAILED TO ATTORNEY'S FOR DEFENDANTS AND I CORTIFY MO SWEAR THE FORESOING IS TRUE.  MICHAEL S. AGURRE, CTYNTORNES SIGNED,  C/O WENDY DAVISSON, DE PUTGETTY MY.  1200 THIRD AVE, SUITE 1100  SANDIEGO, CA 92101  UNLUM DRUGHTUNG